Vanessa R. Waldref United States Attorney Eastern District of Washington Patrick J. Cashman Assistant United States Attorney Post Office Box 1494 Spokane, WA 99210-1494 Telephone: (509) 353-2767 7 UNITED STATES DISTRICT COURT 8 FOR THE EASTERN DISTRICT OF WASHINGTON 9 UNITED STATES OF AMERICA, 2:22-CR-66-TOR 10 Plaintiff, **INDICTMENT** 11 12 Vio.: 21 U.S.C. § 841(a)(1), V. 13 RAYMOND JOHN PFLUGER 14 15 Defendant. (Count 1) 16 17 18 (Count 2) 19 21 U.S.C. § 853 20 21 22 The Grand Jury charges: 23 COUNT ONE 24 26 27

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FILED IN THE U.S. DISTRICT COURT EASTERN DISTRICT OF WASHINGTON

JUN 07 2022

(b)(1)(B)(viii) Distribution of 5 Grams or More of Actual (Pure) Methamphetamine

> 21 U.S.C. § 841(a)(1), (b)(1)(C) Distribution of Fentanyl

Forfeiture Allegations

On or about or about December 7, 2021, in the Eastern District of Washington, the Defendant, RAYMOND JOHN PFLUGER, did knowingly distribute 5 grams or more of actual (pure) methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(viii).

COUNT TWO

On or about or about December 28, 2021, in the Eastern District of Washington, the Defendant, RAYMOND JOHN PFLUGER did knowingly distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

NOTICE OF CRIMINAL FORFEITURE

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense(s) in violation of 21 U.S.C. § 841, as set forth in this Indictment, Defendant RAYMOND JOHN PFLUGER, JR., shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s) and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense(s).

If any forfeitable property, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

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the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p). DATED this ___ day of June, 2022. United States Attorney Patrick J. Cashman Assistant United States Attorney

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